

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

In re:  
THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,  
as representative of  
THE COMMONWEALTH OF PUERTO RICO, *et al.*,  
Debtor.<sup>1</sup>

PROMESA  
Title III  
No. 17 BK 3283-LTS  
(Jointly Administered)

In re:  
THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,  
as representative of  
PUERTO RICO ELECTRIC POWER AUTHORITY  
Debtor.

PROMESA Title III  
Case No. 17-BK-4780 (LTS)

**URGENT UNOPPOSED MOTION OF SREAAEE FOR LEAVE TO FILE SUR-REPLY**

**To the Honorable Court:**

COMES NOW, Sistema de Retiro de los Empleados de la Autoridad de Energía Eléctrica ("SREAAEE"), creditor and party in interest, through its undersigned attorneys, hereby respectfully submits this Urgent Unopposed Motion for Leave to File a Sur-reply.

1. On May 14, 2018, the Official Committee of Retirees (the "Retiree Committee") filed a motion requesting an Order providing for the representation of PREPA retirees in PREPA's Title III case (Docket # 824).

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<sup>1</sup> The Debtors in these Title III cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's Federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 04780-LTS) (Last Four Digits of Federal Tax ID: 3747) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

2. On May 25, 2018, SREAAEE filed an Objection to the Retiree Committee's Motion (the "Objection", Docket # 844), SREAAEE stated in its Objection that it is willing and able to appear and represent the retirees' interests in PREPA's Title III case.

3. On May 30, 2018, the Retiree Committee filed a *Reply in Support of Motion of the Official Committee of Retired Employees of the Commonwealth of Puerto Rico Regarding Representation of PREPA Retirees* (the "Reply", Docket # 853). In its Reply, the Retiree Committee mentions some documents and/or information it requested from SREAAEE and raised its concern about alleged possible inherent conflicts that preclude SREAAEE from representing the interests of all PREPA Retirees.

4. SREAAEE respectfully requests a leave to file a sur-reply of no more than 5 pages. The sur-reply will be filed no later than June 1, 2018, at 4:00 pm.

5. SREAAEE certifies that it has reached out to counsels for the Retiree Committee and that such party does no object to SREAAEE's request. A proposed order is attached as Exhibit A.

In Ponce, Puerto Rico, this 1<sup>st</sup> day of June, 2018.

**I HEREBY CERTIFY** that, on this same date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all participants and Standard Parties. Paper copies have been mailed pursuant to Section II of the *Fourth Amended Notice, Case Management and Administrative Procedures*:

- (i) Chambers of the Honorable Laura Taylor Swain (two copies shall be delivered to the chambers):  
United States District Court for the Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl St., Suite No. 3212  
New York, New York 10007-1312;
  
- (ii) Office of the United States Trustee for Region 21  
Edificio Ochoa, 500 Tanca Street, Suite 301  
San Juan, PR 00901-1922



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## **EXHIBIT A**

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,  
as representative of  
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Debtor.<sup>2</sup>

In re:

THE FINANCIAL OVERSIGHT AND  
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Debtors.

PROMESA  
Title III  
No. 17 BK 3283-LTS  
(Jointly Administered)

PROMESA Title III  
Case No. 17-BK-4780 (LTS)

**ORDER GRANTING URGENT UNOPPOSED MOTION OF SREAAEE FOR  
LEAVE TO FILE SUR-REPLY**

Upon the *Urgent Unopposed Motion of SREAAEE for Leave to File a sur-reply* (the “Urgent Motion”), and there being no objections, it is **HEREBY ORDERED THAT**:

1. The Urgent Motion is granted.
2. SREAAEE may file a sur-reply brief of no more than 5 pages, excluding case caption, signature pages, and any exhibits, no later than June 1, 2018 at 4:00 p.m. (Atlantic Standard Time).

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<sup>2</sup> The Debtors in these Title III cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s Federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 04780-LTS) (Last Four Digits of Federal Tax ID: 3747) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

3. The Court shall retain jurisdiction to hear and determine all matters arising from the implementation of this Order.

SO ORDERED.

Dated: \_\_\_\_\_  
San Juan, Puerto Rico

LAURA TAYLOR SWAIN  
United States District Judge